

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EUGENE SCALIA, Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

SHIRLEY T. SHERROD, *et al.*,

Defendants.

**Case No. 1:16-cv-04825
Hon. Andrea R. Wood**

**DECLARATION OF SHIRLEY T. SHERROD IN SUPPORT OF HER OPPOSITION
TO THE SECRETARY'S MOTION FOR SUMMARY JUDGMENT**

I, Shirley T. Sherrod, M.D. declare as follows:

1. I am an ophthalmologist and was the owner of Shirley T. Sherrod, M.D., P.C. (the "Company").
2. The Company established the Shirley T. Sherrod, M.D., P.C. Target Benefit Pension Plan (the "Plan") in order to provide retirement benefits to the participants of the plan.
3. This declaration is filed in support of my Opposition to the Secretary's Motion for Summary Judgment. I have personal and firsthand knowledge of the facts stated in this declaration. If called upon to do so, I could and would testify competently thereto.
4. Attached hereto as Exhibit A are true and correct copies of documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2015 along with annotations reflecting my knowledge as to the nature of same.

5. Attached hereto as Exhibit B are true and correct copies of documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2016 along with annotations reflecting my knowledge as to the nature of same.

6. Attached hereto as Exhibit C are true and correct copies of documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2017 along with annotations reflecting my knowledge as to the nature of same.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on November 7, 2020.

Respectfully submitted,

/s/ 
Shirley T. Sherrod, M.D.

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**EXHIBIT INDEX TO THE DECLARATION SHIRLEY T. SHERROD IN SUPPORT OF
HER OPPOSITION TO THE SECTARY'S MOTION FOR SUMMARY JUDGMENT**

Exhibit No.	Description
A.	Documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2015
B.	Documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2016
C.	Documentation reflecting legal and administrative expenses incurred on behalf of the Plan in the year 2017

EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL

EXHIBIT C

FILED UNDER SEAL